

**RICHARD A. SMITH, WSBA 15127**  
**SMITH LAW FIRM**  
**314 No. Second Street**  
**Yakima, WA 98901**  
**Telephone: 509-457-5108**

Attorneys for Defendant  
Juan Bravo Zambrano

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF WASHINGTON**  
**(Honorable Edward F. Shea)**

UNITED STATES OF AMERICA,	)	NO. 4:15-cr-06049-EFS-19
	)	
Plaintiff,	)	
	)	<b>AMENDED</b>
vs.	)	JOINT PROPOSED CASE
	)	MANAGEMENT DEADLINES
Jese David Casillas Carrillo (2);	)	
Rosa Araceli Grandado (3); Francisco	)	
Duarte Figueroa (6); Gabriela Mendoza	)	
Vasquez (7); Brittney Lee Zaragoza	)	
(10); Salvador Gudino Chavez (11);	)	
Juvenal Landa Solano (14); Erica Maria	)	
Solis (15); Edgar Omar Herrera Farias	)	
(16); Juan Bravo Zambrano (19);	)	
Miguel Reyes Garcia (21); Jose Adrian	)	
Mendoza (23); and Veronica Elvira	)	
Cortez (24),	)	
	)	
Defendants.	)	

**TO: Clerk, U.S. District Court, Eastern District of Washington; and**  
**TO: Stephanie A. Van Marter, Assistant United States Attorney.**

AMENDED JOINT PROPOSED CASE MANAGEMENT  
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Pursuant to the Court's order of August 31, 2017 to meet and confer regarding proposed amended deadlines, counsel for Juan Zambrano (19) prepared a proposed Amended Case Management Order and distributed the same on September 7, 2017 to all defense counsel for review, objections or corrections. At the same time defense counsel distributed the same to Assistant United States Attorney Stephanie Van Marter on September 7, 2017 requesting her review, revisions, objections or correction.

Having received no objections, corrections or revisions from defense counsel or Assistant United States Attorney Van Marter, defense counsel submits the following proposed dates and deadlines in this matter:

	<b>Recommended Dates</b>
Rule 16 expert summaries produced to other parties and emailed to Court:  USAO's Experts (not previously disclosed) Defendant's Experts USAO's Rebuttal Experts	November 15, 2017 December 15, 2017 January 2, 2018
All pretrial motions, including discovery motion, <i>Daubert</i> motions, and motions <i>in limine</i> , filed	January 15, 2018
1 <sup>st</sup> Pretrial Conference	December 19, 2017
Final Pretrial Conference ( <i>Deadline for motions to continue trial</i> )	March 6, 2018
CI's identities, Giglio disclosures and willingness to be interviewed disclosed to Defendant (if applicable)	January 2, 2018

Grand Jury transcripts disclosed to Defendant:	
Case Agent	January 2, 2018
CIs (if applicable)	January 2, 2018
Other witnesses	January 2, 2018
Exhibit lists filed and emailed to the Court	February 26, 2018
Witness Lists filed and emailed to the Court	February 26, 2018
Trial briefs, jury instructions, verdict forms, and requested voir dire filed and emailed to Court	February 26, 2018
Exhibit binders delivered to all other parties	February 26, 2018
Whether any witness likely to exercise Fifth Amendment rights and requires appointed counsel	February 26, 2018
Delivery of JERS-compatible digital evidence files to the Courtroom Deputy	February 26, 2018
Trial notices filed with Court	February 26, 2018
Exhibit binders delivered to the Court	March 12, 2018
Technology readiness meeting (in-person)	March 12, 2018
<b>JURY TRIAL</b>	<b>March 26, 2018</b> <b>Richland</b>

DATED this 13th day of September, 2017.

Presented by: *Smith Law Firm*

/s/ RICHARD A. SMITH

RICHARD A. SMITH, WSBA 15127  
Attorney for Defendant Zambrano (19)

AMENDED JOINT PROPOSED CASE MANAGEMENT  
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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on September 13, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Stephanie A. Van Marter, Assistant United States Attorney; and  
Defense Counsel

/s/ Lugene M. Borba

LUGENE M. BORBA